

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

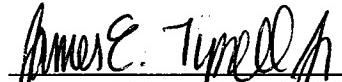
-----  
IN RE WORLD TRADE CENTER DISASTER :  
SITE LITIGATION : 21 MC 100 (AKH)  
-----  
IN RE WORLD TRADE CENTER LOWER :  
MANHATTAN DISASTER SITE LITIGATION :  
----- : 21 MC 102 (AKH)  
IN RE COMBINED WORLD TRADE CENTER :  
AND LOWER MANHATTAN DISASTER SITE :  
LITIGATION : 21 MC 103 (AKH)  
-----

**NOTICE OF MOTION FOR STAY PENDING APPEAL**

**PLEASE TAKE NOTICE** that on a day to be determined by this Court, Defendants the City of New York and the Contractors ("Defendants") shall apply to the Honorable Alvin K. Hellerstein, U.S.D.J. at the Southern District of New York, located at 500 Pearl Street, New York, New York, Room 14-D for an Order, pursuant to Rule 62(d) of the Federal Rules of Civil Procedure, Granting Defendants' Motion for Stay Pending Appeal.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion, Defendants rely upon the annexed Affidavit of Christine LaSala, sworn to September 21, 2011, the accompanying Memorandum of Law in Support of Motion for Stay Pending Appeal, and all prior proceedings had herein.

Dated: September 21, 2011

  
\_\_\_\_\_  
James E. Tyrrell, Jr. (JT 6837)  
FATTON BOGGS LLP  
1185 Avenue of the Americas  
New York, New York 10036  
(212) 246-5100  
-and-  
One Riverfront Plaza, 6<sup>th</sup> Floor  
Newark, New Jersey 07102  
(973) 848-5600  
*Attorneys for Defendants The City of New York  
and the Contractors*